PETER A. BEE*
RICHARD P. READY
PETER M. FISHBEIN
JAMES R. HATTER
THOMAS J. DONOVAN †
KENNETH A. GRAY
DONALD J. FARINACCI
WILLIAM C. DEWITT
MICHAEL P. SIRAVO

BEE READY FISHBEIN HATTER & DONOVAN, LL,

BRFH&D

ATTORNEYS-AT-LAW

SENIOR ASSOCIATES

**STEPHEN L. MARTIR ANDREW K. PRESTON

ASSOCIATES

† BRIAN A. SUPER DEANNA D. PANICO PETER OLIVERI, JR. AMOS BRUNSON, JR. DARNELL J. MARROW RHODA Y. ANDORS JASON S. GREENFIELD

MAILING/SERVICE ADDRESS

NASSAU COUNTY OFFICE

OF COUNSEL

EDWARD P. RA ROBERT G. LIPP † ROBERT R. McMILLAN (Retired)

- * ALSO ADMITTED IN FL
 ** ALSO ADMITTED IN NJ
- † DECEASED

June 5, 2019

Honorable A. Kathleen Tomlinson U.S. Magistrate Judge United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722-4438

Re:

Semencic v. County of Nassau, et al

USDC EDNY Docket No.: 18-CV-05244 (SJF) (AKT)

Dear Judge Tomlinson:

This law firm represents the Defendants, the Franklin Square and Munson Fire Department, firefighter Daniel Maloney, firefighter Robert Fineo, and firefighter John Doe #2 (collectively, the "Fire Department Defendants") in the above-referenced Action. We respectfully request an extension to serve the Fire Department Defendants' response to Plaintiff's interrogatories for Daniel Maloney.

Pursuant to the Court's Order following the discovery status conference on April 2, 2019, responses to requests for production of documents and requests for interrogatories must be served by June 7, 2019. However, Daniel Maloney is unable to sign and notarize his verification page, because he is on active duty and does not have access to a notary until he returns home on June 14. At this time, the Fire Department Defendants are seeking a 14 day extension, to file their response to Plaintiff's interrogatories for Daniel Maloney. The present deadline is June 7, 2019. If granted, the new deadline would be June 21, 2019. The requested extension should not affect any other deadlines currently in place. Furthermore, the Fire Department Defendants fully intend to respond to Plaintiff's document demands and Plaintiff's interrogatories for Robert Fineo on a timely basis. This is the Fire Department Defendants' first request for an extension of time to respond to the Maloney interrogatories. Plaintiff has consented to this extension.

Thank you for your consideration of this matter.

Deanna Panico

Very Truly Yours,